

**MOVANT SHAUN BRIDGES' MOTION FOR EXPANSION OF
TIME TO FILE HIS REPLY TO GOVERNMENT'S OPPOSITION
PAPERS TO MOVANT'S 28 U.S.C. 2255 MOTION**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States of America,

Plaintiff,

v.

Shaun Bridges,

Defendant.

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Case Number 3:15-cr-00319-RS

Noticed Date: July 16, 2018

Noticed Time: 12:00pm, Pacific Time

MOVANT'S MOTION FOR EXPANSION OF TIME

I. LOCAL CIVIL RULE 7-2(b)(2) and (b)(3) Information

The instant motion for expansion of time to file Movant Shaun Bridges' Reply to the Government's opposition papers is noticed for Monday, July 16, 2018 at 12:00pm, Pacific Time.

Movant herein respectfully requests an order of this court for an expansion of time to file his Reply brief from Monday, July 16, 2018 until Friday, August 24th.

II. PROCEDURE

On or about June 13, 2018, Movant filed a motion, pursuant to 28 U.S.C. §2255, for miscellaneous relief. On or about June 21, 2018, this Honorable Court issued an order directing the government to respond to Movant's 2255 motion no later than July 12, 2018. The Court's June 21, 2018 order provided no schedule for Defendant's reply papers. The government timely responded on July 12, 2018. According to Local Criminal Rule 47-2(d), Movant has four days, or until Monday, July 16, 2018, to file his Reply brief. For the reasons stated in the attached July 14, 2018 declaration of Scott L. Fenstermaker, Esq., Movant respectfully requests an expansion of time to file his Reply brief from Monday, July 16, 2018 until Friday, August 24, 2018.

III. GROUNDS

Movant is incarcerated at the Federal Correctional Institution at Terre Haute, Indiana in the so-called Correspondence Management Unit (“CMU”). *See* July 14, 2018 Declaration of Scott L. Fenstermaker, Esq., Paragraph 3 (“Fenstermaker Declaration”). Movant and the undersigned need to communicate effectively in order to file a persuasive Reply to the Government’s July 12, 2018 opposition brief. *See* Fenstermaker Declaration, Paragraphs 7 through 9.

Movant can only communicate with the undersigned by privileged legal mail, non-privileged e-mail, or by legal telephone calls. *See* Fenstermaker Declaration, Paragraphs 4 through 6. Legal mail is cumbersome because of the onerous conditions imposed on legal mail to CMU-housed prisoners. *See* Fenstermaker Declaration, Paragraph 4. Non-privileged e-mails are not appropriate because of the nature of the communications that counsel and Movant need to send to properly submit a persuasive Reply brief. *See* Fenstermaker Declaration, Paragraph 5. Finally, legal telephone calls take some time to arrange and make effective editing more difficult under the circumstances presented here. *See* Fenstermaker Declaration, Paragraph 6.

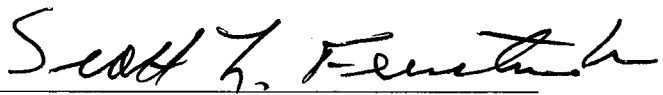
Movant and the undersigned cannot communicate effectively in order to file a proper Reply brief by Monday, July 16, 2018.

IV. CONCLUSION

For the foregoing reasons, Movant respectfully requests an expansion of time to file his Reply brief from Monday, July 16, 2018 until Friday, August 24th.

Dated: July 14, 2018
New York, New York

The Law Offices of Scott L. Fenstermaker, P.C.
Attorney for Movant Shaun Bridges

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